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Management
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August 19, 1991

ATKEARNEY

Ms. Carol Johnson
Regional Project Officer
U.S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R03-21-08; Sun Oil, Marcus Hook, PA; Addendum and Phase II RCRA Facility Assessment Report; Final Deliverable

Dear Ms. Johnson:

Enclosed please find the Addendum and Phase II RCRA Facility Assessment (RFA) report and a diskette in WordPerfect 5.0 for the Sun Oil facility. The Addendum contains responses to comments on the draft RFA report received from Sun Oil (letter dated June 6, 1991). The Addendum was prepared in accordance with the "EPA Contractor Protocol for Addressing EPA and Facility Comments on RFAs".

The enclosed Final Phase II RFA report incorporates new and relevant information received from Sun Oil (in Attachment 1 of their submittal), and contains appropriate revisions to text based on this information. These changes are included in bold type face for ease of reference.

In addition to an attachment of specific changes/comments on the RFA report (Attachment D), Sun included a discussion concerning the approach to the corrective action at Sun Oil and a strategy for implementation of corrective action at the facility. Because this discussion did not deal specifically with the RFA report, it was not addressed in the Addendum. General comments on this discussion are presented below.

Overall, the discussion reflects a poor understanding of the corrective action process and EPA's authority to require corrective action under Section 3004 and 3008 of HSWA. Sun's claim that 57 SWMUs included in the report are not solid waste management units and that EPA has no authority to include areas of concern in the report are not substantiated. Sun simply states "At this time, it is not necessary or productive to present a full explanation of reasons why Sun believes that these areas are beyond EPA's authority...". Therefore, there is no basis to delete any units from the RFA report.

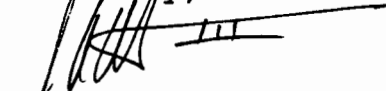
Ms. Carol Johnson
August 19, 1991
Page Two

In addition, Sun is proposing a conceptual approach to remediation that appears to bypass the RFI and CMS processes and proceed directly to the CMI based on Sun's "understanding" of the significant problems. Sun has provided no data or other information to support their approach, and the approach, as proposed, would not be adequate to properly characterize the rate and extent of contamination at this site. This is especially important because of the complexity of the hydrogeologic setting of this facility.

The original photographs are with the Draft Report. We have provided copies here.

Please feel free to call me at 703/548-4700, or Gayle Kline, who can be reached at 703/671-0400, if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to be 'J.A. Atchue III', with a horizontal line extending to the right.

J.A. Atchue III
Technical Director

Enclosure

CC: H. Lee, EPA Region III
A. Glazer
L. Poe
G. Bennis (w/o enclosure)
K. Gonnella (w/o enclosure)
B. Smith
G. Kline, MRI